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July 30, 2018

Hon. Joseph F. Bianco United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

Re:

Moroughan v. The County of Suffolk, et al.

Case No.: 2:12-cv-00512-JFB-AKT LJAA File No.: 0153.1490.0000

Dear Judge Bianco:

The office of Lewis Johs Avallone Aviles, LLP represents DEPUTY CHIEF OF PATROL JOHN HUNTER ("Hunter") in the above-referenced matter. This letter is submitted on consent.

Pursuant to the Order granting Docket No. 260, summary judgment moving papers are to be filed by July 30, 2018. As the Court is aware, Hunter is subject to a stipulation of confidentiality in this matter (Docket No. 253, 255).

Accordingly, Hunter respectfully requests permission to file the Attorney Declaration with annexed exhibits in support of his motion for summary judgment under seal. The Memorandum of Law, 56.1 Statement, and Notice of Motion will not be filed under seal. Plaintiff consents to the filing under seal of the Attorney Declaration with annexed exhibits.

We thank the Court for its consideration.

Respectfully submitted,

/s/

Annemarie S. Jones asjones@lewisjohs.com

Islandia Office

ASJ/msag